

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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In re:	:	Chapter 11
	:	
EMAS CHIYODA SUBSEA LIMITED, <i>et</i>	:	Case No. 17-31146 (MI)
<i>al.,</i>	:	
	:	(Joint Administration Pending)
Debtors.¹	:	(Emergency Hearing Requested)

**AGENDA FOR EMERGENCY HEARING ON FIRST DAY MOTIONS AND
APPLICATIONS**

I. INTRODUCTION

1. **First-Day Declaration:** Declaration of Stephen H. McGuire in Support of Chapter 11 Petitions and First Day Pleadings [Docket No 15].

II. FIRST DAY MOTIONS AND APPLICATIONS

A. Procedural Motions/Applications

1. **Joint Administration Motion:** Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of the Chapter 11 Cases and (II) Granting Related Relief [Docket No. 2]

Status: The Hearing on this matter is going forward.

2. **Complex Case Designation Motion:** Debtors' Notice of Designation as Complex Chapter 11 Bankruptcy Cases [Docket No. 3]

Status: The Hearing on this matter is going forward.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number and jurisdiction of formation are as follows: EMAS CHIYODA Subsea Limited (UK) (3187); EMAS Chiyoda Subsea Inc. (Delaware) (7884); EMAS CHIYODA Subsea Marine Base LLC (Texas) (5974); Lewek Falcon Shipping Pte. Ltd. (Singapore) (041E); EMAS CHIYODA Marine Base Holding Co., LLC (Texas) (7463); EMAS Chiyoda Subsea Services Pte. Ltd. (Singapore) (333Z); EMAS-AMC Pte. Ltd. (Singapore) (0442); EMAS Saudi Arabia Ltd. (Saudi Arabia) (0669); Lewek Constellation Pte. Ltd. (Singapore) (376E); EMAS CHIYODA ROV Pte. Ltd. (Singapore) (049M); EMAS CHIYODA Subsea Services B.V. (Netherlands) (4073); EMAS CHIYODA Subsea Services (UK) Limited (Scotland) (3187); EMAS CHIYODA Subsea Services LLC (Delaware) (1728); EMAS CHIYODA Subsea (Thailand) Co., Ltd. (Thailand) (1011); Gallatin Marine Management, LLC (Delaware) (8989). The address of the Debtors' U.S. headquarters is 825 Town & Country Ln, Suite 1500, Houston, TX 77024.

3. **Consolidated List of Creditors Motion:** Debtors Emergency Motion for Entry of an Order (I) Authorizing the Filing of a Consolidated List of Top 30 Unsecured Creditors, (II) Waiving the Requirement that Each Debtor File a List of Creditors, and (III) Authorizing the Debtors to Establish Procedures for Notifying Parties of the Commencement of These Cases [Docket No. 4]

Status: The Hearing on this matter is going forward.

4. **Schedules Extension Motion:** Debtors' Emergency Motion for an Order (I) Granting Additional Time to File Schedules and Statements of Financial Affairs, (II) Granting Additional Time to File Reports of Financial Information Required Under Bankruptcy Rule 2015.3, and (III) Authorizing Debtors to File Consolidating Monthly Operating Reports [Docket No. 5]

Status: The Hearing on this matter is going forward.

5. **Claims and Noticing Agent Application:** Debtors' Emergency Application for Order Authorizing the Employment and Retention of Epiq Bankruptcy Solutions, LLC as Claims, Noticing, Solicitation, and Administrative Agent Nunc Pro Tunc to the Petition Date [Docket No. 6]

Status: The Hearing on this matter is going forward.

B. Operational Motions

6. **Employee Wages Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing, but Not Directing, the Debtors to Pay Prepetition Employee Obligations, (II) Authorizing, but Not Directing, the Debtors to Continue Certain Employee Benefit Programs in the Ordinary Course, and (III) Authorizing, but Not Directing, Applicable Banks to Honor Prepetition Checks for Payment of the Prepetition Employee Obligations [Docket No. 7]

7. Status: The Hearing on this matter is going forward.

8. **Taxes Motion:** Debtors' Emergency Motion for an Order Authorizing the Debtors to Pay Certain Prepetition Taxes and Related Obligations [Docket No. 8]

Status: The Hearing on this matter is going forward.

9. **Insurance Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Thereunder and (B) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies and (II) Directing Financial Institutions to Honor all Related Payment Requests [Docket No. 9]

Status: The Hearing on this matter is going forward.

10. **Utilities Motion:** Debtors' Emergency Motion for Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [Docket No. 10]

Status: The Hearing on this matter is going forward.

11. **Critical Vendor Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing, but Not Directing, Payment of Prepetition Claims of Certain Critical Vendors and Service Providers and (II) Granting Related Relief [Docket No. 11]

Related Documents:

- a. Declaration of Daniel Sack in Support of Debtors' Emergency Motion for Interim and Final Orders Authorizing, but Not Directing, Payment of Critical Vendors and (II) Granting Related Relief

Status: The Hearing on this matter is going forward.

12. **Cash Management Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Approving the Continued Use of the Debtors' Cash Management System and (II) Granting Related Relief Docket No. 12

Related Documents:

- a. Declaration of Soo Foon Leong in Support of Debtors' Emergency Motion for and Order (I) Approving the Continued Use of the Debtors' Cash Management System and (II) Granting Related Relief.

Status: The Hearing on this matter is going forward.

13. **Motion to Enforce Automatic Stay:** Debtors' Emergency Motion for Order Enforcing and Restating Automatic Stay and Ipsa Facto Provisions of the Bankruptcy Code [Docket No. 13]

Status: The Hearing on this matter is going forward.

14. **DIP Financing Motion:** Debtors' Emergency Motion for Entry of Interim and Final DIP Orders (I) Authorizing the Debtors to Obtain Secured Superpriority Postpetition Financing, (II) Scheduling A Final Hearing, and (III) Granting Related Relief [Docket No. 14]

Status: The Hearing on this matter is going forward.

15. **Adequate Protection Stipulation and Agreed Order:** Anticipated to be filed prior to the hearing.

Dated: Houston, Texas
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PORTER HEDGES LLP

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